

Donna, please review this and discuss with me before I proceed.

This is Frank Doyle.

A man that was fined \$3000 in 1985 for improper storage (no spcc plan) and marking. He wrote a check for \$50.00 and settled the case.

In 1990, an inspection (including the TAT Team to sample) was made at the same site as before (established about 1979). The highest level of PCB Contamination onsite was 87 PPM, the highest contamination offsite (up-gradient) was 280 PPM.

Every since the 1985 fine episode, Mr Doyle states that he has had a policy of not accepting transformers with PCBs or oil in them. He only has 4 current customers. When asked about the City of Seymore, he stated that he quit doing business with them after he got in trouble the last time. The City of Seymore inspection has receipts dated 6/87 and 7/87 that prove he purchased transformers from Seymore on those dates. As far as I know this is not honest, but it is not a violation of TSCA either.

Mr. Doyle has two storage tanks that he drains residual oil into. He still sells this oil to Scoggins Oil Company in Oklahoma (I recommend they be put on the inspection scheme).

None of his storage tanks tested above 24 PPM. The walls of his building tested 97 microgr/wipe (un-determined wipe size).

Mr. Doyle has improperly disposed because of the contamination on-site. The date and quantity are unknown.

I see one major violation, disposal without quantity

Level 1 Minor with a reduction of 30% for conc. = \$3500.00
No adjustment for previous violations >5 years = 0.00

TOTAL ESTIMATED PENALTY

\$3500.00 =

This is an NON under current policy.

ER
Bob
Sullivan
2273
2273

1. Cleanup
2. Subpoena



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

RECEIVED

July 15, 1991

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MEMORANDUM

TOXICS SECTION

Subject: Frank J. Doyle Transformer

To: (b) (6)

From: Robert Sullivan, On-Scene Coordinator

Dear (b) (6)

This memorandum summarizes the contents of the site assessment report (attachment 1), submitted by Ecology and Environment, Inc., the EPA Emergency Response Branch (ERB) Technical Assistance Team (TAT) contractor. TAT collected a variety of samples to characterize the site.

TAT took oil samples from transformers, drums and storage tanks onsite. TAT analytical results document non-detect (nd) for polychlorinated biphenyls (PCB). Samples were split with a Toxic Substance Control Act (TSCA) inspector. TSCA analytical results document a maximum PCB value of 24 parts per million (ppm), which is less than the TSCA threshold for compliance of 50 ppm. A PCB Compliance Monitoring Report (attachment 2) was prepared by the TSCA Branch. This data indicates that the Doyle facility is currently in compliance with PCB handling requirements as per TSCA regulations.


TAT took wipe samples of the kiln inside the transformer dismantling building. Analytical results document non-detect (nd) for PCB, and non-detect (nd) for 2,3,7,8-tetrachlorodibenzodioxin (TCDD) and 2,3,7,8-tetrachlorodibenzofuran (TCDF), possible combustion byproducts of PCB. This data indicates that PCB and TCDD/TCDF are not present in the kiln.

TAT took a soil sample of the (b) (6) property and a wipe sample of the (b) (6) residence. Analytical results document non-detect (nd) for PCB and TCDD/TCDF. This data indicates that no PCB or TCDD/TCDF contamination exists at the (b) (6) property or residence.

TAT took soil samples in the drainage pathways adjacent to the Doyle property. Analytical results document a maximum PCB value of 280 ppm in the south drainage path. This data does not support the statutory imminent and substantial endangerment criteria for removal actions by the ERB.

TAT also conducted a Spill Prevention Control and Countermeasure (SPCC) inspection (attachment 3) of the Doyle facility. Deficiencies were noted and subsequent corrective action was implemented by Doyle.

Based upon the TAT site assessment report, the ERB does not plan to take any action at this site at this time. The Doyle case is being referred to the EPA TSCA Branch. EPA ERB wishes to thank you for your patience and concern in its investigation of the Frank J. Doyle Transformer facility.


Robert M. Sullivan, OSC
Emergency Response Branch

cc: Paul Thomas (6T-PT) (TSCA)
Carl Hickam (6H-E) (ATSDR)
Jim Mullins (6E-EI) (ERB)